

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

V.

THOMAS J. PETTERS, GREGORY M. BELL, and LANCELOT INVESTMENT MANAGEMENT LLC,

Defendants,

and

**INNA GOLDMAN, INNA GOLDMAN
RECOVABLE TRUST, ASIA TRUST
LTD. AS TRUSTEE FOR THE BLUE
SKY TRUST, and GREGORY BELL
REVOCABLE TRUST,**

Relief Defendants.

**DEFENDANTS' MOTION SEEKING
ATTORNEYS' FEES AND LIVING EXPENSES**

Defendants Gregory M. Bell (“Mr. Bell”) and Lancelot Investment Management (“LIM”) and Relief Defendants Gregory Bell Revocable Trust and Inna Goldman (“Bell’s Trust” and collectively “Movants”) move the Court to grant limited relief from the July 24, 2009 Order by releasing assets to pay living expenses and professional fees.

To begin with, Mr. Bell's family has no independent assets; accordingly, Mr. Bell requests that the Court release \$5,806 per month from the nearly \$30,000,000 in assets the Government has frozen for the continued well-being of his wife and two minor children. Next, Mr. Bell requests that the court release a one-time payment of \$5,287 to pay for his mother in law's (who suffers from Hutchinson's disease) nursing care and his children's back-to-school and college entrance exam expenses. Finally, given the detailed requirements of the Court's July 24, 2009 Order and the on-going demands of defending both a civil and criminal action, Movants ask that the Court approve the First Fee Application submitted by their professionals contemporaneously with this motion.

Movants seek relief on an expedited basis because nearly two months have passed since the Court froze their assets and living and professional expenses continue to mount. In support of their motion, Movants have filed a memorandum of law. *See* L.R. 7.1.

Dated: September 10, 2009

Gregory Bell, Lancelot Investment
Management, LLP, and Gregory Bell
Revocable Trust

/s/ Vincent P. Schmeltz III
One of Their Attorneys

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Inna Goldman

/s/ Inna Goldman
On Her Own Behalf